

Exhibit 23

STATE OF TEXAS, ET AL. v. UNITED STATES OF AMERICA, ET AL.
Dr. Leighton Ku on 06/27/2018

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF TEXAS
3 BROWNSVILLE DIVISION
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8 :
9 IN THE MATTER OF: :
10 :
11 STATE OF TEXAS, et al., :
12 :
13 Plaintiffs, :
14 :
15 v. : Case No.
16 : 1:18-CV-68
17 UNITED STATES OF AMERICA, :
18 et al., :
19 :
20 Defendants, :
21 :
22 and :
23 :
24 KARLA PEREZ, et al., :
25 :
26 Defendant- :
27 Intervenor, :
28 :
29 and :
30 :
31 STATE OF NEW JERSEY, :
32 :
33 Defendant- :
34 Intervenor. :
35 :
36 -----
37
38 Wednesday,
39 June 27, 2018
40
41 Washington, D.C.
42
43
44 DEPOSITION OF:
45
46
47 LEIGHTON KU
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49
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1 called for examination by Counsel for the
2 Plaintiffs, pursuant to Notice of Deposition, in
3 the Mexican American Legal Defense and Education
4 Fund, located at 1016 16th Street, NW,
5 Washington, D.C., when were present on behalf of
6 the respective parties:

7 APPEARANCES:

8 On Behalf of the Plaintiffs, State of Texas, et
9 al.:

10 ADAM ARTHUR BIGGS, ESQ.
11 State of Texas
12 Office of the Attorney General
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14 Austin, TX 78711-2548
15 512-936-0750
16 512-936-0545 fax
17 adam.biggs@oag.texas.gov

18 On Behalf of the Defendants, United States of
19 America, et al.:

20 AARON S. GOLDSMITH, ESQ.
21 U.S. Department of Justice
22 Civil Division
23 Office of Immigration Litigation
24 Liberty Square Building
25 450 5th Street, NW
Washington, D.C. 20530
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1 APPEARANCES: (CONT.)

2 On Behalf of the Defendant-Intervenors, Karla
3 Perez, et al.:

4 ALEJANDRA AVILA, ESQ.
5 Mexican American Legal Defense and Education
6 Fund (MALDEF)
7 110 Broadway
8 Suite 204
9 San Antonio, TX 78205
10 210-224-5476
11 210-224-5382 fax
12 aavila@maldef.org

13 On Behalf of the Defendant-Intervenors, State of
14 New Jersey, et al.:

15 KENNETH S. LEVINE, ESQ.
16 State of New Jersey
17 Department of Law and Public Safety
18 Division of Law
19 124 Halsey Street
20 P.O. Box 45029
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25

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1 Q And --

2 A I maybe have tried to contact them but
3 I don't recall.

4 Q Were you asked to provide that email
5 to your Attorney?

6 A My Attorney did not ask me for that
7 email.

8 Q Do you still have that email?

9 A Probably. I think so.

10 Q Do you have any plans to delete that
11 email anytime soon?

12 A I'm not planning to do so.

13 Q All right. To the extent that this
14 minor incentive exists, is the introductory
15 phrase in the next sentence, would you agree that
16 this incentive may exist?

17 A The incentive may exist for, in some
18 cases.

19 Q Do you claim it will be countered by
20 other employment compliance barriers that firms
21 may face in hiring DACA recipients?

22 What are those other employment
23 compliance barriers?

24 A They're described in the citation that
25 I described, which is to say that there are

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C E R T I F I C A T E

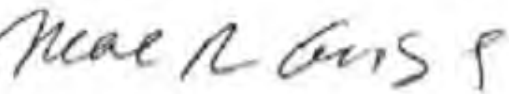
This is to certify that the foregoing transcript
Deposition of: Dr. Leighton Ku

In the matter of: State of Texas v USA
Before: US District Court for Southern
District of Texas

Date: 06-27-18

Place: Washington, DC

were duly recorded and accurately transcribed
under my direction; further, that said transcript
is a true and accurate record of the proceedings;
and that I am neither counsel for, related to,
nor employed by any of the parties to this action
in which this deposition was taken; and further
that I am not a relative nor an employee of any
of the parties nor counsel employed by the
parties, and I am not financially or otherwise
interested in the outcome of the action.



Neal Gross
Court Reporter